

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

AVR GROUP, LLC; TRIDENT ASSET
MANAGEMENT, INC.; and MICHAEL
DZIURGOT, individually and on behalf of a
putative class,

Plaintiffs,

vs.

ALEBRIJE ENTERTAINMENT, LLC;
CRAIG COLE; MATTHEW COLE;
GUSTAVO MONTAUDON; and JOHN
DOE NOS. 1–10,

Defendants.

Case No. 1:24-cv-20755

**DEFENDANT CRAIG COLE’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE REPLY IN SUPPORT OF HIS MOTION TO DISMISS**

Defendant Craig Cole (“Cole”), through undersigned counsel, respectfully moves for this Court to extend the deadline for Cole to file a reply in support of his Motion to Dismiss, and in support states:

1. On May 6, 2024, Cole moved to dismiss the Complaint in this case because this Court lacks personal jurisdiction over Cole, among other reasons. Mot. Dismiss. [D.E. 43].
2. Plaintiffs responded in opposition to Cole’s motion to dismiss on June 14, 2024. Pls.’ Resp. Mot. Dismiss [DE 60].
3. Cole’s reply to Plaintiffs’ response is currently due on June 21, 2024.
4. Plaintiffs had over one month to respond to the motion to dismiss and undersigned counsel requires more time to research, draft, and file his reply to Plaintiffs’

response.

5. Cole requests a 10-day extension from June 21, 2024, until July 1, 2024, to file his reply.
6. Plaintiffs' counsel does not oppose the requested relief.
7. A proposed order is attached hereto as Exhibit 1.

WHEREFORE, Cole requests that this Court grant this motion and extend the deadline for him to file a reply in support of his motion to dismiss until July 1, 2024.

Certificate of Conferral

Pursuant to Local Rule 7.1(a)(3), I certify that I conferred with Alexander Loftus, Esq., counsel for Plaintiffs via email on June 17, 2024. Mr. Loftus indicated that the Plaintiffs do not oppose the relief requested.

Dated: June 20, 2024

Respectfully submitted,

**STUMPHAUSER KOLAYA NADLER &
SLOMAN, PLLC**
Two South Biscayne Boulevard, Suite 1600
One Biscayne Tower
Miami, FL 33131
Telephone: (305) 614-1400
Facsimile: (305) 614-1425

/s/ Francis D. Murray
Francis D. Murray
Fla. Bar No. 108567
fmurray@sknlaw.com
Tel.: (305) 614-1400
Fax: (305) 614-1425

Attorney for Defendant Craig Cole

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 20, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Francis D. Murray
Francis D. Murray